

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

20 CV 10868

Devora Shabtai

Write the full name of each plaintiff.

CV

(Include case number if one has been assigned)

-against-

Goldie Shabtai, New York Guardianship
services, Mordechai Buls, Peter Strauss
Ken Barocas, Daniel Miller, Russell

Morgan

Write the full name of each defendant. If you need more space, please write "see attached" in the space above and attach an additional sheet of paper with the full list of names. The names listed above must be identical to those contained in Section II.

COMPLAINT

Do you want a jury trial?

☐ Yes ☐ No

RECEIVED
CLERK OF COURT
2020 DEC 23 PM 12:23

NOTICE

The public can access electronic court files. For privacy and security reasons, papers filed with the court should therefore *not* contain: an individual's full social security number or full birth date; the full name of a person known to be a minor; or a complete financial account number. A filing may include *only*: the last four digits of a social security number; the year of an individual's birth; a minor's initials; and the last four digits of a financial account number. See Federal Rule of Civil Procedure 5.2.

I. BASIS FOR JURISDICTION

Federal courts are courts of limited jurisdiction (limited power). Generally, only two types of cases can be heard in federal court: cases involving a federal question and cases involving diversity of citizenship of the parties. Under 28 U.S.C. § 1331, a case arising under the United States Constitution or federal laws or treaties is a federal question case. Under 28 U.S.C. § 1332, a case in which a citizen of one State sues a citizen of another State or nation, and the amount in controversy is more than \$75,000, is a diversity case. In a diversity case, no defendant may be a citizen of the same State as any plaintiff.

What is the basis for federal-court jurisdiction in your case?

☒ Federal Question

☐ Diversity of Citizenship

A. If you checked Federal Question

Which of your federal constitutional or federal statutory rights have been violated?

B. If you checked Diversity of Citizenship

1. Citizenship of the parties

Of what State is each party a citizen?

The plaintiff, _____, is a citizen of the State of
(Plaintiff's name)

(State in which the person resides and intends to remain.)

or, if not lawfully admitted for permanent residence in the United States, a citizen or subject of the foreign state of

If more than one plaintiff is named in the complaint, attach additional pages providing information for each additional plaintiff.

If the defendant is an individual:

The defendant, _____, is a citizen of the State of _____
(Defendant's name)

or, if not lawfully admitted for permanent residence in the United States, a citizen or subject of the foreign state of _____

If the defendant is a corporation:

The defendant, _____, is incorporated under the laws of _____
the State of _____

and has its principal place of business in the State of _____

or is incorporated under the laws of (foreign state) _____

and has its principal place of business in _____

If more than one defendant is named in the complaint, attach additional pages providing information for each additional defendant.

II. PARTIES

A. Plaintiff Information

Provide the following information for each plaintiff named in the complaint. Attach additional pages if needed.

Devora Shabta
First Name Middle Initial Last Name

2118 east 69th st Apt 1F 2
Street Address

Brooklyn New York 11234
County, City State Zip Code

(718) 954-4973
Telephone Number

d.shabtai@yahoo.com
Email Address (if available)

B. Defendant Information

To the best of your ability, provide addresses where each defendant may be served. If the correct information is not provided, it could delay or prevent service of the complaint on the defendant. Make sure that the defendants listed below are the same as those listed in the caption. Attach additional pages if needed.

Defendant 1:	<u>see attached</u>		
	First Name	Last Name	
	<u> </u>		
	Current Job Title (or other identifying information)		
	<u> </u>		
	Current Work Address (or other address where defendant may be served)		
	<u> </u>		
	County, City	State	Zip Code
Defendant 2:	<u>see attached</u>		
	First Name	Last Name	
	<u> </u>		
	Current Job Title (or other identifying information)		
	<u> </u>		
	Current Work Address (or other address where defendant may be served)		
	<u> </u>		
	County, City	State	Zip Code
Defendant 3:	<u>see attached</u>		
	First Name	Last Name	
	<u> </u>		
	Current Job Title (or other identifying information)		
	<u> </u>		
	Current Work Address (or other address where defendant may be served)		
	<u> </u>		
	County, City	State	Zip Code

Defendant 4:

First Name

Last Name

Current Job Title (or other identifying information)

Current Work Address (or other address where defendant may be served)

County, City

State

Zip Code

III. STATEMENT OF CLAIM

Place(s) of occurrence: _____

Date(s) of occurrence: _____

FACTS:

State here briefly the FACTS that support your case. Describe what happened, how you were harmed, and what each defendant personally did or failed to do that harmed you. Attach additional pages if needed.

See attached

INJURIES:

If you were injured as a result of these actions, describe your injuries and what medical treatment, if any, you required and received.

see attached

IV. RELIEF

State briefly what money damages or other relief you want the court to order.

see attached

V. PLAINTIFF'S CERTIFICATION AND WARNINGS

By signing below, I certify to the best of my knowledge, information, and belief that: (1) the complaint is not being presented for an improper purpose (such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation); (2) the claims are supported by existing law or by a nonfrivolous argument to change existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the complaint otherwise complies with the requirements of Federal Rule of Civil Procedure 11.

I agree to notify the Clerk's Office in writing of any changes to my mailing address. I understand that my failure to keep a current address on file with the Clerk's Office may result in the dismissal of my case.

Each Plaintiff must sign and date the complaint. Attach additional pages if necessary. If seeking to proceed without prepayment of fees, each plaintiff must also submit an IFP application.

Dec 20, 2020

Dated

Devora

First Name

Middle Initial

Plaintiff's Signature

shabtai

Last Name

Street Address

Brooklyn

New York

11234

County, City

State

Zip Code

(718) 954-4973

Telephone Number

d_shabtai@yahoo.com

Email Address (if available)

I have read the Pro Se (Nonprisoner) Consent to Receive Documents Electronically:

☒ Yes ☐ No

If you do consent to receive documents electronically, submit the completed form with your complaint. If you do not consent, please do not attach the form.

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

Devora Shabtai

Plaintiff

CIVIL ACTION NO. _____

COMPLAINT AND JURY
DEMANDED

-against-

Goldie Shabtai, New York Guardianship Services, Mordechai Buls
Peter Strauss, Ken Barocas, Daniel Miller, Russell Morgan
Defendants

Plaintiff, pro se, Devora Shabtai, as and for her complaint alleges as follows:

Preliminary Statement

This is an action for a civil rights violation of 1990. Defendants allege that plaintiff is incompetent and is not fit to be her mother's guardian. This is also an action of fraud, malpractice, intentional infliction of emotional distress, unjust enrichment, defamation, and slander.

Jurisdiction and Venue

This court has jurisdiction over the subject matter of this action pursuant to 28 U.S.C. 1332. This court may exercise supplemental jurisdiction over the state law claims pursuant to 28 U.S.C. S. 1367 because such claims are so related to the claims within this court's original jurisdiction that they form part of the same case or controversy. The matter in controversy, exclusive of interest and costs, exceeds the sum of seventy thousand dollars (\$75,000).

Venue is proper in this Court pursuant to 28 U.S.C S1391 (b), because defendant resides in this judicial district and a part of the events or omissions giving rise to the claims asserted herein arise from this judicial district.

The Parties

1. Plaintiff, Devora Shabtai, is an individual and resides at 2118 East 69th Street, Brooklyn, New York, 11234.

2. Defendant Goldie Shabtai is plaintiff's sister. Upon information and belief she is residing at 301 east 79th Street, Apt 3M, New York, New York 10021 and works for Richard Porzio. She also lives in Israel and has an apartment at Yochanan Beder 6/59, Ramat Gan Israel.
3. Defendant Russell Morgan is plaintiff Devora Shabtai's ex-lawyer. He is located at 299 Broadway, 17th Floor, New York, NY 10007.
4. New York Guardian Services (NYGS) is a corporation located at 1204 Avenue U #2001, Brooklyn, New York 11229 and has a chief operating officer, David Blau.
5. Mordechai Buls is an attorney for New York Guardian Services located at 1317 Avenue J, 2nd Floor, Brooklyn, New York 11230.
6. Peter Strauss is Goldie Shabtai's attorney. He is located at 488 Madison Avenue, Suite 1120, New York, NY 10022.
7. Daniel Miller is the court evaluator in the guardianship case. He is located at 365 Bridge Street #7Pro, Brooklyn, New York 11201.
8. Ken Barocas is a court appointed attorney for Miriam Shabtai aka Mary Shabtai, my mother. He is located at 26 Court Street, Suite 711, Brooklyn, New York 11242.

Affirmation of Complaint

I, Devora Shabtai am the pro se plaintiff and affirm the following:

1. I am a supervisor with the Department of Social Services for New York City. I have been working for the City of New York for the past seven years.
2. The City of New York has done an extensive background check on me and found me to be competent.
3. I have a steady job and have to maintain a certain level of competency. However, my sister, defendant Goldie Shabtai, has no responsibilities. She can get on a plane whenever she feels like it and on a whim. Defendant Goldie Shabtai goes with any man that gives her monies; including a Richard Porzio; a convicted sex offender, she stays with when she comes to New York on a regular basis.
4. I am the total opposite of my sister. I have an education (an Engineering and an MBA) while my sister is a high school dropout. I am empathetic while my sister is a pathological liar narcissist who uses anyone just for their wallet. I am competent while upon information and belief, my sister is

a bipolar who needs to be medicated and cannot hold down a legitimate job.

5. I never had a relationship with my sister, defendant Goldie Shabtai, because she masquerades as being legitimate when she is a criminal assisting human traffickers. She travelled the world with criminals for the past 25 years first working as a sex worker and then recruiting others for prostitution.
6. Upon information and belief, the crooked defendant Goldie Shabtai and the other crooked defendants believe they can defraud the courts the same way my lawyer ex-husband accomplished in duping the courts against me for 15 years.
7. The above defendants used fraud, force and a biased judge to put a guardian on a property that was willed to me by my father. They are violating my civil rights and are making a mockery of the court system.

THE GUARDIAN DEFENDANT NYGS IS NOT NEUTRAL. ON DECEMBER 22, 2020 I SPOKE TO CHRISTINA DILORENZO WHO STATED THAT THE GUARDIAN TOLD HER TO TAKE ME OFF THE CONTACT LIST AND NOT ALLOW ME TO SPEAK TO MY MOTHER'S DOCTORS.

8. Defendant NYGS is not neutral. He is separating me from my mom with no justification and told the Phoenix rehab center to take me off the contact list.
9. On October 6, 2020 at 10:38 am, I spoke to Josph Lu, the social worker who stated that he was told by defendant NYGS and defendant Buls, the attorney for the guardian to not allow me to speak to my mother's doctors.

THE ABOVE DEFENDANTS ARE TRYING TO COPYCAT THE FRAUD THAT MY EX-HUSBAND SUCCEEDED IN DUPING THE COURTS FOR 15 YEARS.

10. My ex-husband was suspended from the Pennsylvania Bar for embezzling monies from clients, not doing any work and fabricating stories to the courts like the above defendants have done to me and others.
11. My ex-husband married me under the pretense of commitment (when he was in love with his secretary) but intended all along to use me as a free surrogate mother and not give me a nickel of his monies.
12. Just like 20 years ago, I was in front of judges that were on their way out here too I am in front of a biased judge that ignored all details I presented.

RUBBERSTAMP ORDER

13. I was tortured for 15 years by lawyers who took my monies and did nothing and judges that could not care less about justice. I went from the

Pennsylvania court to the New York court and then to the Florida court all to no avail trying to get my kids back and was ignored only because a rubberstamp order was made behind my back.

TOTAL FRAUD AND A RUBBERSTAMP ORDER

14. The above defendants pulled the same strategy as my ex-husband lawyer pulled by getting a rubberstamp order behind my back. On June 6, 1999, my ex-husband (who was in front of Judge Harhut hundreds of times in Lackawanna County of Pennsylvania) received a rubberstamp order of sole custody without any visitation for me without trial and hearing claiming that I am mentally ill.
15. The same situation here. On March 17, 2020, behind my back and against my wishes the crooked defendant Morgan, my ex-lawyer, defendant Peter Strauss, defendant Ken Barocas and defendant Miller got a rubberstamp order from Judge Knipel for a third party guardian for nefarious reasons.

MY SISTER IS A HUMAN TRAFFICKER WITH NO SENSE OF SELF THAT IS BEYOND REPAIR. SHE WILL GO WITH ANY MAN THAT WILL GIVE HER MONIES AND ALLOW HER TO LIVE A JET SET BILLIONAIRE LIFESTYLE

16. Defendant Goldie Shabtai did not hide what she was doing for a living when my daughter, Sarah Levande, came to Israel with her cousin. My sister had two different guys at two different times paying hundreds of dollars for dinner with the family.
17. My sister is delusional, emotionally unstable, and may be bipolar like my mother. She believes her lawyer, defendant Peter Strauss, who is duping her into believing, that guardian is "free" and not costing any money.

DEFENDANT GOLDIE SHABTAI IS PROMISING EVERYONE MONIES. MY AUNT CALLED ME ON DECEMBER 20, 2020 TO TELL ME THAT DEFENDANT GOLDIE'S DAUGHTER DOES NOT OWN A HOUSE. WHY WOULD MY AUNT CARE IF MY NIECE OWNS A HOUSE OR NOT?

18. My sister defendant Goldie Shabtai is promising everyone monies. Upon information and belief she has been promising monies to the former upstairs tenants who damaged the property to sell the house, to the next door neighbor to harass me, to the above defendants, to my aunts and cousins.

19. The maternal aunts are narcissistic who believe they can "get over" everyone. This has been expressed to me by the paternal side who call defendant Goldie Shabtai a "bloodsucker". My own crooked ex-lawyer, defendant Morgan called her a "zero" even though he wants to get paid for doing nothing.

MY MOTHER IS IN A REHAB CENTER AND I LIVE IN THE PROPERTY AND I AM TAKING CARE OF THE PROPERTY SO WHAT IS THE BENEFIT OF A GUARDIAN? THE ONLY PURPOSE OF THIS GUARDIAN IS FOR NEFARIOUS REASONS; TO TORTURE AND HARRASS ME TO EMOTIONAL DISTRESS.

20. The crooked 80 year old defendant Peter Strauss is duping my sister into believing that defendant New York Guardian Services is "free".
21. The crooked 80 year old defendant Peter Strauss is charging my sister \$600 an hour, and duping her into believing that she can override our father's will through the guardianship court. Upon information and belief, my sister is getting the money from one of her male associates.
22. I was the only person that helped my parents through my entire life. I took the role of a guardian on behalf of my parents because my mother is bipolar and there was always a division in the household.
23. My sister, defendant Goldie Shabtai exploited the division in the household and my mother's mental illness by taking my father's rental income in Israel (which now belongs to me) and pocketing it for herself and her two adult children.
24. My sister, defendant Goldie Shabtai, skipped parental visits and when she came over a hundred times to the United States within the past 25 years. She only visited my parents a few times.

MY FATHER HAS BEEN SUPPORTING THREE GENERATIONS; MY SISTER, HER TWO DAUGHTERS AND HER FIVE GRANDCHILDREN FOR THE PAST THIRTY YEARS.

25. My sister was booted out of my parent's house 39 years ago (at the age of 14) because she was promiscuous and was expelled from two high schools. My father, out of guilt for kicking her out of the house, supported my sister, her two adult daughters, her son-in-law, and five grandchildren. He purchased apartments for my sister and her two daughters and gave them money.
26. My sister's son-in-law and her adult daughters are exerting undue influence on my sister to override our father's will and take everything for themselves.

27. The crooked defendant Goldies Shabtai did not attend my father's funeral and refused to pay any monies toward the funeral.

THREE MONTHS AFTER MY FATHER CAME BACK FROM ISRAEL AFTER SEEING MY SISTER, HE SIGNED A WILL; WILLING ME ALL HIS PROPERTIES AND MONIES.

28. My father knew his two daughters very well and knew that my sister is travelling with criminals around the world. My father suspected that these criminals may want their money back. In his will, he gave everything to me. My father realized that my sister did not love him and only exploited him for his monies. Three months after coming back from Israel, he signed a will.

MY FATHER HAD DISCUSSIONS WITH ME ABOUT BRINGING BACK THE THREE CHILDREN MY MOTHER ABORTED. MY FATHER HAS A TALL ORDER AND KNOWS THAT I WILL BRING THESE THREE CHILDREN BACK TO THIS WORLD AND THEREFORE GAVE ME ALL HIS MONIES.

29. My parents were horrible parents and felt guilty over the three abortions that my mother had. My parents want me to bring back the three children that were aborted by using a fertility clinic and raise them as orthodox Jews. They know that yeshiva costs about \$1000 a month per child and I would need every nickel of their monies to raise a new set of children as an older parent.

30. My father willed me all his monies so that I will have more children. If I am about to have children in my late 50's and early 60s, I need every nickel to take care of a new set of children.

31. My father was supportive of me going through fertility and I attempted once and I will continue trying.

32. My father went to Israel in April 2019 with the hope that my sister will take care of him during his stay in Israel. My sister saw him a few times while he was there.

33. I received a call from a neighbor in the building my father was staying in while in Israel that my father was all alone and no one came to visit him. This means he was not visited by my sister, his grandchildren, my mother's siblings, or his own siblings.

I WAS MY PARENTS GUARDIAN ALL MY LIFE AND TOOK CARE OF THEM MOST OF MY LIFE.

34. All the above six defendants are claiming that I am "incompetent" and not fit to be guardian for my mother when I was unofficially my parent's

guardian most of my life. Defendant Goldie Shabtai is delusional. However, the rest of the defendants know exactly what they are doing. They want to steal my money and the property given to me in my father's will.

THE ABOVE DEFENDANTS WANT TO RAID MY PROPERTIES THAT WAS WILLED TO ME BY MY FATHER AND USING A BIASED JUDGE THAT IGNORED ALL FACTS (AND MAY BE ON HER WAY OUT AS A JUDGE) TO PUT A GUARDIAN ON MY PROPERTY.

35. Defendant Goldie Shabtai, my sister, has harassed me with a nonsensical Guardianship case when the house in Brooklyn may be seized by the City of New York because my mother has been on Medicaid since 2012.
36. Defendant Goldie Shabtai is delusional; she stated to me that since I did not raise my daughters and I am "old" I am not entitled to the properties that was willed to me.
37. My sister, defendant Goldie Shabtai, is an emotionally disturbed person who may be bipolar like my mother. Bipolar disorder runs in my mother's side of the family and there is a strong chance that my sister needs help.
38. I have lived with my parents most of my life and I have been my parent's guardian most of my life. My parents were illiterate in English and both had a mental health issue. My mother is bipolar and my father was a narcissist. I knew from a very young age that my parents were different than my friend's parents.
39. I was my parent's pride and joy; they always wanted me to be with them and help them. My father had pictures of me and my children in all his prayer books and my mother proudly displayed my engineering degree from Polytechnic University on a wooden plaque in the Tel Aviv apartment.
40. Upon information and belief my sister trashed the wooden plaque that was in the Tel Aviv apartment.
41. My parent's relationship totally disintegrated when my sister was approximately nine or ten. At the age of ten, while in the fifth grade, defendant Goldie Shabtai would put on a tight pair of pants, after returning from Prospect Park yeshiva for girls, and go to Coney Island to ask old men for money. Lisa Greenwald, a classmate of my sister, confirmed this story.
42. At the age of fourteen, my sister was sexually active with a neighborhood criminal named "Toni." Instead of giving my sister tutoring lessons because she was failing her classes and getting her proper psychiatric help, my parents sent my sister to live with her maternal grandmother in Israel. This grandmother was given huge sums of monies for taking care of her.

43. My maternal aunts and uncles will never admit to the fact that my maternal grandmother received huge amounts of money for taking care of my sister.
44. My parents were never legally married and had a very hostile relationship for the past 50 years. My mother is bipolar and was violent towards my father and me. My father allowed my mother to stay in his house because her siblings and my sister did not want her in Israel. When my mother went to Israel, she was always alone. She came back to New York knowing that I was always there for her.
45. I was the one that called the police to place my mother in a rehab center, however the guardian defendant NYLS are the ones that are receiving credit for it from Judge Ottley.
46. On September 9, 2020, defendant Goldie Shabtai claimed to the court that she is happy that my mother is in a rehab center because I allegedly isolated my mother from her, however on December 3, 2020 defendant Goldie Shabtai and her daughter called me to curse me out to bring my mother back home.
47. The defendants are claiming that I am "incompetent" and not fit to be a guardian for my mother. There is no documentation proving their claims. They are using Judge Ottley, the guardianship judge, to make the New York Guardianship Service to be a guardian on a property that was given to me in my father's will.
48. Defendant Daniel Miller insisted that all of my mother's six siblings be served in Israel with the guardianship case even though they had nothing to do with my mother her entire life and never visited her while she was in Israel. I paid hundreds of dollars for each motion, letter, and order to show cause to serve the defendants and my mother's siblings in Israel.
49. Whenever my mother was in Israel, her siblings never visited my mother (including my sister and my nieces) and my mother always came back to New York because she was alone in the apartment. Out of loneliness, my mother returned to New York because no one was there for her.
- WHAT IS THERE TO LIE ABOUT A BAD HOME ATTENDANT THAT TOOK MY FATHER TO A REAL ESTATE AGENT IN ORDER TO MAKE COMMISSION? EVERYTHING I SAID TO THE CROOKED DEFENDANT DANIEL MILLER AND DEFENDANT KEN BAROCAS WAS IGNORED.**
50. The crooked defendant Miller, the court appointed attorney for the guardianship case, refused to believe that my father's home attendant

drove my father around in her car and brought him to a real estate agent in order to sell his house. The home attendant told my father to sell his house and give me half the money. Instead of speaking to my dad about his health and that he needed to have an operation, the home attendant was speaking to my dad about selling his house.

51. The crooked evaluator, defendant Daniel Miller stated to the court that I did not open the door to allow the real estate agent to sell the property.

52. No real estate agents brought buyers to the property. Who is the alleged buyer that wanted to purchase the property that the crooked defendant Miller is referring to?

THE CROOKED DEFENDANTS HAVE BEEN COLLABORATING FROM DAY ONE ALONG WITH MY CROOKED EX-ATTORNEY RUSSELL MORGAN TO GET A CUT FROM THE SELL OF MY PROPERTY. THEY WANT TO SELL THE PROPERTY RIGHT UNDERNEATH ME.

53. The crooked defendant Daniel Miller, defendant Ken Barocas, defendant Peter Strauss, defendant NYGS have been collaborating from day one to place a guardian in place to sell the property right underneath me to pay themselves.

54. The crooked defendant Ken Barocas insinuated to the biased Judge Ottley that I am "crazy" for emailing the court about defendant NYGS not doing his job.

JUST BECAUSE MY CROOKED SISTER DEFENDANT GOLDIE SHABTAI IS CONTESTING THE GUARDIANSHIP DOESN'T MEAN THAT A THIRD PARTY GUARDIAN SHOULD BE PLACED IN A HOME I AM TAKING CARE OF, PAYING BILLS, AND LIVING AT FOR THE PAST 50 YEARS.

55. The office of staff analyst union I belong, have stated that the crooked defendant Daniel Miller, and his father always gave a report to the court for a third party guardian for nefarious reasons.

56. Upon information and belief, the homecare agency my father used, has purchased more than 10 houses at a substantial discounted price and was attempting to purchase my parent's property at a discounted price.

57. The crooked defendant Daniel Miller, defendant Ken Barocas, and crooked 80 year old defendant Peter Strauss are blaming me for my father's mistakes. My father paid half of his property tax bill and has a \$41,000 in property tax bill with \$26,000 in interest.

58. Upon information and belief, after I made a payment agreement with the City of New York in April 2020, \$31,000 in property taxes went up to \$43,000.

59. The crooked defendant New York Guardianship Services never questioned the property tax bills and couldn't care less that the city added an extra \$12,000 after a payment agreement was put in place.

THE CROOKED 80 YEAR OLD DEFENDANT PETER STRAUSS DUPED THE COURT INTO BELIEVING THAT THERE IS A FORECLOSURE ON THE PROPERTY WHEN NO SUCH THING EXISTS, HOWEVER THE BIASED JUDGE IGNORED EVERYTHING WHEN I SENT HER PROOF.

60. I am in negotiation with New York City and am trying to decrease the interest on the property tax bill. Defendant Peter Strauss has duped the court in believing that the property is in foreclosure.

61. On October 19, 2020, my father passed away and left a will giving me his properties and money. The above defendants are using the guardianship case in an attempt to override my father's will and steal my money and my property.

62. Six months before my father's death, he went to Israel hoping that defendant Goldie Shabtai and her children would take care of him. He came back to New York dejected and depressed realizing that my sister is not who she claimed to be.

63. Upon information and belief, my sister robbed my father's diamonds instead of helping him get situated in Israel and staying there. He came back to New York with a broken heart and three months later in July 2019 made a will.

THE CROOKED DEFENDANT MORGAN ALONG WITH THE OTHER DEFENDANTS TOLD THE COURT THAT I AGREED TO A "GUARDIAN" WHEN I NEVER AGREED TO SUCH A THING.

64. I hired defendant Russell Morgan for a guardianship case (100258/19) on behalf of my mother and paid him \$1500 up front.

THE CROOKED DEFENDANT MORGAN GAVE ME WRONG ADVICE TO FILE IN GUARDIANSHIP COURT WHEN I SHOULD NEVER HAVE FILED IN GUARDIANSHIP COURT.

65. Defendant Russell Morgan advised me to file in guardianship court even though my mother gave me power of attorney over the Brooklyn house we live in. I later found my father's will giving me ownership of this house as well as properties in Israel. Mr. Morgan ignored this information as well as

the information I gave him about my power of attorney. Mr. Morgan convinced me to go to guardianship court, instead of probate court, presumably because it was in his financial interests. Since I own the house, there should not be a temporary guardian.

THE CROOKED DEFENDANT MORGAN HAS DONE THIS TO OTHER CLIENTS; A SYSTEM WHERE HE DOES NOT OPPOSE ANY DOCUMENTS WHICH BENEFITS HIS POCKETS. HE DOES NOTHING FOR THE MONIES HE GETS.

66. Upon information and belief, I am not the only person defendant Morgan has done this to. Defendant Morgan has a system that benefits his wallet. He never opposes any opposition papers in order to keep the case going. He charges his clients for reading the opposition papers while not taking action and doing nothing.
67. Defendant Morgan kept me in the dark and did not show me, discuss with me, or answer any of the opposition papers. This includes defendant Goldie Shabtai's cross petition, answer, and notice of motion for a temporary guardian.
68. Defendant Morgan did not want me to sit right next to him during the February 6, 2020 hearing. I believe he wanted to show the opposition that he was on their side.
69. Defendant Goldie Shabtai with her attorney defendant Peter Strauss filed a cross petition and answer in November 2019; however I did not see it until April 23, 2020; five months later because my ex-attorney never showed me anything that was filed.
70. Defendant Morgan did not respond to any of my emails or concerns. I received no confirmation of any of my over 60 emails and over 30 texts I sent him. He charged me for phone calls and emails that I made to him, however he took no action.

THE CROOKED DEFENDANT MORGAN INTENTIONALLY TOLD THE COURT THAT I AGREED TO A GUARDIAN WHEN I NEVER DID.

71. On March 14, 2020, I send an email two times making it very clear to defendant Morgan that I do not agree to any guardian being put in place.
72. On March 17, 2020, defendant New York Guardianship Services was placed illegally and against my wishes. Defendant Morgan did not answer the notice of motion for a temporary guardian even though I explained to him that I am taking care of the house, which had a tenant, and that I do not need a temporary guardian. Why would I pay defendant Morgan \$2000 to \$2500 a month to put a guardian on a property that was willed to me?

73. Judge Ottley transferred the case to Judge Lawrence Knipel who basically rubberstamped an order for a temporary guardian on March 17, 2020. There is no transcript to verify what transpired on March 17, 2020. It appears that defendant Morgan was collaborating with my sister's attorney, defendant Peter Strauss, and agreed to a temporary guardian which became a permanent guardian.
74. Defendant Goldie Shabtai testified out of turn on February 6, 2020 while I never testified.
75. On February 6, 2020, defendant Goldie Shabtai testified out of turn allegedly in the notice of motion for a temporary guardian that her job was at "risk" with Go-be marketing and that she needs to return to Israel on February 18, 2020. Go-Be marketing is a fictitious company that does not exist.
- VICIOUSLY, WICKEDLY AND INTENTIONALLY DEFENDANT MORGAN TOLD ME THAT A TEMPORARY GUARDIAN WILL BECOME A "PERMANENT GUARDIAN" AND STATED THAT HE WILL APPEAL. DEFENDANT MORGAN DID NOT SHOW ME THE NOTICE OF MOTION FOR A TEMPORARY GUARDIAN AND DID NOT ANSWER THE NOTICE OF MOTION FOR A TEMPORARY GUARDIAN THAT WAS FILED BY DEFENDANT PETER STRAUSS.**
76. Defendant Morgan, by not answering a notice of motion for a temporary guardian, basically agreed that a temporary guardian should be placed. Why should I pay \$2,000 for a temporary guardian when I am taking care of the property and I was the one who placed my mother in a rehabilitation center?
- THE CROOKED 80 YEAR OLD DEFENDANT STRAUSS COLLOBORATED WITH DEFENDANT MORGAN. DEFENDANT STRAUSS FABRICATED A STORY FOR THE NOTICE OF MOTION FOR A TEMPORARY GUARDIAN WHILE DEFENDANT MORGAN DID NOT ANSWER THE NOTICE OF MOTION FOR TEMPORARY GUARDIAN WHICH BASICALLY PLACED A "GUARDIAN" ON A PROPERTY THAT WAS WILLED TO ME.**
77. The crooked 80 year old defendant Strauss defrauded the court in his notice of motion for a temporary guardian by claiming that I did not pay property taxes, water bills and other bills. Defendant Strauss defrauded the court by claiming that the house will go to foreclosure even though there is a payment agreement with the City of New York about the property taxes.

78. The crooked defendant Strauss also claimed, in his notice of motion for a temporary guardian, that my sister is working for a Go-Be Marketing, a fictitious company, and came to New York on February 6, 2020 and left on February 18, 2020. This is false because my sister was calling me from New York numbers for a full year from July 2019 through June 25, 2020.
79. Defendant Goldie Shabtai called me on June 8 and June 9, 2020 from a Richard Porzio's number in New York while claiming to the court that she is in Israel. Richard Porzio is a convicted sex offender.
80. The crooked defendant Morgan was released as my attorney by the court on June 29, 2020. However, from March 17, 2020 to June 29, 2020, defendant Morgan refused to do an order to show cause to vacate the temporary guardian from the time the temporary guardian was appointed to the time he was released as my attorney. If defendant Morgan was truly acting in my best interests, he should have attempted to vacate the temporary guardian.
81. I have sent dozens of notice of motions for discovery for documents and order to show cause from March 29, 2020 to September 29, 2020 and judge Ottley ignored everything.
82. Defendant Morgan refused to do discovery for documents, like my sister's passport. These documents would prove defendant Goldie Shabtai is a sex worker who has traveled every two months all over the world with criminals for the past 25 years.
83. If defendant Morgan would have done discovery for documents, it would have been easily seen that my sister lied under oath on February 6, 2020. Defendant Goldie Shabtai was here from July 2019 to June 2020. Her attorney defendant Peter Strauss claimed that she just got here on February 6, 2020 and left on February 18, 2020. That was a complete fabrication.

FICTITIOUS DOCUMENTS OF DEFENDANT GOLDIE SHABTAI OWNING THE HOLON PROPERTY IN ISRAEL AND FICTITIOUS JOB LETTER WAS SUBMITTED BY THE CROOKED 80 YEAR OLD DEFENDANT PETER STRAUSS

84. Defendant Goldie Shabtai and her attorney defendant Peter Strauss swore under oath and submitted a fictitious document alleging that my father gave my sister the Holon property when there is a will giving me this property.

THE COURT, DEFENDANT MORGAN, DEFENDANT STRAUSS DID NOT SHOW ME OR ALLOW ME TO VERIFY THE FICTITIOUS DOCUMENT SHOWING THAT MY SISTER OWNS THE HOLON PROPERTY.

85. The crooked defendant Morgan refused to show me the fictitious document that claims that my father gave my sister the Holon property. No documents exists, but is a complete fabrications to steal property that does not belong to her.

MY FATHER PURCHASED MY SISTER AND HER CHILDREN APARTMENTS IN ISRAEL. HOWEVER, DEFENDANT GOLDIE SHABTAI IS ILLEGALLY COLLECTING RENTS ON APARTMENTS THAT WAS WILLED TO ME.

86. Defendant Goldie Shabtai and her two adult daughters have apartments that my father purchased for them. They are also collecting rents illegally on apartments that belong to me and were willed to me.

87. Defendant Goldie Shabtai wants everything for herself including charging me rent on a property that was willed to me. I horrifically heard Judge Ottley state "are you paying rent?" when the properties were all willed to me.

88. The crooked defendant Goldie Shabtai submitted a fictitious job letter, from Go-Be Marketing, in the notice of motion for a temporary guardian. Defendant Morgan never requested supporting documentation proving that she has no job. Defendant Morgan never showed me or discussed with me the contents of the motion.

THE BIASED JUDGE OTTLEY ALONG WITH THE DEFENDANTS INNUENDOES HAVE MADE IT VERY CLEAR THEIR CLAIMS THAT I AM "INCOMPETENT" TO BE MY MOTHER'S GUARDIAN.

89. The biased Judge Ottley refuses to hear the facts that I lived with my parents all my life and I am fit to be a guardian for my mother. There is no documentation proving that I am incompetent and not fit to be my mother's guardian. I have lived with my parents most of my life and my parents loved having me in their house.

90. After my father's death, my mother's mental health declined rapidly and she became violent almost on a daily basis. Defendant Morgan refused to do a mental health warrant on my mother and ignored my pleas that my mother was violent.

91. On February 15, 2020, I sent the crooked defendant Morgan a video tape of my mother threatening the upstairs tenant with a knife for non-payment of

rent. Defendant Morgan refused to do a mental health warrant on my mother.

92. The crooked defendant Morgan refused to believe that my sister, defendant Goldie Shabtai, was harassing my mother and provoking my mother to attack me on a daily basis. I had to call the police four times because of my mother's violence against me before she was committed to Brookdale Hospital and later committed to a rehabilitation center.
93. I was the one that committed my mother to Brookdale Hospital and to be placed to a rehab center, however the judge twisted around as though the non-paying tenant was the one that did it.
94. Defendant Morgan never did anything. He never did discovery and he did not file papers opposing the appointment of a temporary guardian while defendant Strauss fabricated a notice of motion for a temporary guardian that defrauded the court with fictitious claims.
95. The crooked 80 year old defendant Strauss defrauded the court on February 6, 2020, by claiming that my father gave my sister the property in Holon, Israel and that my sister is allowed to get income from those properties when my father willed the properties to me.
- THE COURT IGNORED EVERYTHING INCLUDING TEXT MESSAGES FROM MY NIECE ON JUNE 10, 2018 REQUESTING MY MOTHER'S ISRAELI IDENTIFICATION TO RENT THE APARTMENT. IF THE APARTMENT ALLEGEDLY BELONGS TO MY SISTER THEN WHY DID MY NIECE REQUEST HER IDENTIFICATION RENT THE APARTMENT?**
96. I have a text message from my niece dated June 10, 2018, requesting Israeli identification in order to rent the Holon property. If the property is hers, why would my niece need my mother's Israeli identification card to rent the apartment?
97. The crooked 80 year old defendant Strauss defrauded the court with claims that my sister came to New York in February 6, 2020 and had to leave on February 18, 2020 due to her job at Go-Be Marketing which is a non-existent fictitious company in Israel.
- EVERYTHING WAS IGNORED BY THE COURT (AS THOUGH I DID NOT EXIST) INCLUDING DOING DISCOVERY FOR THE FICTITIOUS DOCUMENTATION THAT THE CROOKED 80 YEAR OLD DEFENDANT STRAUSS SUBMITTED TO THE COURT**

98. I have asked the court to do discovery and get documents from defendant Strauss, my sister's attorney, for the fictitious company my sister claims she works at, however, Judge Ottley ignored everything.

99. Upon information and belief, defendant Goldie Shabtai is not working for a Go-Be Marketing, a fictitious company, but is working for a Richard Porzio, a convicted sex pedophile, to recruit females for prostitution in Europe and in Israel.

THE CROOKED DEFENDANT GOLDIE SHABTAI IS FIGHTING FOR OWNERSHIP OF THE PROPERTY IN BROOKLYN WHEN THE HOUSE MAY BE SEIZED BY THE CITY OF NEW YORK. SHE IS DELUSIONAL BELIEVING THAT I WILL NOT FIGHT FOR THE PROPERTIES IN ISRAEL THAT WAS WILLED TO ME. SHE IS USING THE GUARDIANSHIP COURT AS A DISTRACTION TO KEEP ME OCCUPIED WITH AN UNNECESSARY GUARDIAN.

100. Upon information and belief, my sister's boss is paying \$600 an hour to defendant Peter Strauss. My sister is fighting me for ownership of the house in Brooklyn when the house may be seized by the City of New York.

101. The crooked defendant Peter Strauss is misinforming defendant Goldie Shabtai by telling her that New York City will not be seizing the house. New York City has seven years after the death of my mother to take ownership of the house because my mother is receiving Medicaid.

102. Even if I was to stop the Medicaid at this point and take my mother to Israel and get her a 24 hour home attendant, New York City will still may come after the Brooklyn property. Defendant Peter Strauss knows this and still petitioned the court for a third-party guardian because it benefits him to keep the case going and get paid at the rate of \$600 an hour.

THE CROOKED DEFENDANT NYLS, THE GUARDIAN AND THE CROOKED DEFENDANT GOLDIE SHABTAI ATTEMPTED TO HAVE ME COMMITTED TO A MENTAL HOSPITAL

103. On June 25, August 12, and August 13, 2020, defendant Goldie Shabtai, along with New York Guardianship Services, contacted the 63rd precinct in order in an attempt to have me committed to a mental hospital. This was done to support the claim that I am incompetent so the court will not give me the guardianship.

104. On August 5, 2020, the upstairs tenants, Alissa Raineri and her husband Jose Lewis Valdez, broke the door and vandalized the framing of the door. They also broke a window which I had to fix. I made a police report against them.

THE CROOKED DEFENDANT NYGS HAS NOT FIXED ANYTHING, PAID ANYTHING OR DID ANYTHING TOWARD THE PROPERTY. THE CROOKED DEFENDANT NYGS AND GOLDIE SHABTAI USED THE FORMER UPSTAIRS TENANTS TO STEP UP THEIR AGGRESSION TOWARD ME AND ALLOWED THEM NOT TO PAY RENT AND DESTROY THE PROPERTY.

105. The crooked defendant NYGS, the guardian, did not fix anything or pay anything in the property. I paid for everything. In fact, the guardian took the side of the upstairs tenants and used them against me.

106. On August 12, 2020, when the 63rd precinct came with four police cars in order to have me committed, there was someone with me who witnessed all this. I was in the middle of my work and speaking to my managers when the police knocked on my door.

107. The crooked defendant NYGS allowed the upstairs tenants to destroy the property and did not care that they were not paying the full rent for the past six years. In fact, the upstairs tenants did not pay their rent a year before the Covid-19 Pandemic, and were taken to landlord tenant court twice. The upstairs tenants damaged the property believing they could buy the property at a reduced price.

THE CROOKED DEFENDANT NYLS HAS DONE NOTHING ON BEHALF OF THE PROPERTY; HAS PAID NO BILLS AND ALLOWED THE UPSTAIRS TENANTS TO DESTROY THE PROPERTY. DEFENDANT NYLS USED THE UPSTAIRS TENANTS AGAINST ME. ALL THESE FACTS WERE IGNORED BY THE COURT.

108. The guardian, defendant NYGS, took the side of the upstairs tenants. Why is the guardian refusing to acknowledge that the upstairs tenants destroyed my property? Why is the guardian refusing to accept that there is unpaid property tax bill of over \$40,000 and water bill because of the non-payment of rent?

THE CROOKED DEFENDANT BULS STATED TO THE COURT THAT I "ILLEGALLY EVICTED THE FORMER UPSTAIRS TENANTS WHEN THEY VOLUNTARILY LEFT AND OWNED A HOUSE A FEW BLOCKS AWAY.

109. The crooked defendant NYGS refused to have the upstairs tenants evicted even though they owned a house a few blocks away. Defendant Mordechai Buls, the attorney representing New York Guardianship services, claimed that I "illegally evicted" them when they voluntarily left and moved to the house they own a few blocks away.

110. Seven times within six years, the upstairs tenants flooded the toilets with baby wipes and q-tips and reduced their rent for the water damage that they themselves caused.
111. The upstairs tenants made unilateral decisions on the property believing it will be their property in the future. For example, they purchased two air conditioners in 2014 and purchased a third air conditioner in August 2020 and took money off the rent. They took the air conditioners with them when they moved.
112. The upstairs tenants claimed they could not pay rent even though she is a real estate agent and he is a stock broker; however they claimed they had \$600,000 in cash to buy the property.
113. After the upstairs tenants received notice that there is a temporary guardian on the property and they have to pay rent to defendant NYGS, they began to step up their aggression against me. I had to fix their air conditioner twice, their broken faucet, the sewer, replace a pipe due to water bubble in the ceiling, and bring the exterminator twice due to alleged "bug infestation."
114. On June 23, 2020, I was informed that the upstairs tenants had a broken faucet in the kitchen. The next day I brought a plumber to fix the faucet. On July 5, 2020 (12 days after I fixed her faucet and after I finished painting my mother's apartment), water was leaking from the upstairs apartment to the ceiling below causing bubbles all over the ceilings.
115. On July 20, 2020, I called the fire department because water was running from the upstairs apartment, to my apartment right beneath it.
116. On August 5, 2020, defendant NYGS pretentiously sent Linda Russo and another female to take pictures of the mold and water damage that the upstairs tenants caused. Instead of taking the pictures, they walked out of the apartment 5 minutes later claiming that she is allergic to cats and there is no damage.
117. The crooked defendant NYGS refused to sue the upstairs tenants for back rent and damages that they caused to the property.
118. Defendant NYGS with their attorney defendant Mordechai Buls informed the Phoenix rehabilitation center not to allow me to receive any medical information or speak to any doctor on behalf of my mother.
119. On October 6, 2020, at 10:38 am, I was informed by the social worker, Joseph Lu, that my name was removed from the visiting list for my

mother, however, my sister and guardian are allowed to receive medical information.

120. I have sent three dozen emails of 80 pictures of the water damage and mold caused by the upstairs tenants to the above defendants and Judge Ottley only to be ignored with the insinuation that I am "crazy" for sending them such emails.

CIRCUMSTANTIAL EVIDENCE POINTING TO DEFENDANT GOLDIE

121. On December 3, 2020, I was verbally attacked by my sister, defendant Goldie Shabtai and her daughter with the phrase, "wishing me dead." Such verbal attacks have been going on since July 2019 when my sister first appeared in New York.
122. My sister and her children called me at 4:00 am in the morning and woke me up from a deep sleep knowing that I have a job to go to in the morning.
123. My tires were slashed all around Brooklyn (over 20 times) and I had no choice but to get rid of the car. I was also in a car accident where I was a passenger that caused me a severe neck injury. The car that was in the car accident that was parked in my driveway was stolen 7 hours later. How did they know where the car is after the accident?
124. My sister, defendant Goldie Shabtai, has recruited and hired the neighbor next door, the Cassanova, to harass me on a daily basis since July 2019.
125. The Cassanova mother stated, "I will make money out of your house" and the daughter stated, "I will buy a new SUV out of your house." Upon information and belief, my sister recruited them to harass me and promised them money from the sale of the property.
126. I would hear the father, Mark Cassanova, speaking against me to whoever came up my stairs saying that I am "crazy" and "mentally ill."
127. Upon information and belief, Mark Cassanova spoke against me to the handymen that came to work for me. Because of the slanderous remarks made against me, two handymen left in the middle of the job. One handyman said that he does not want to get involved with the neighbors next door.
128. On approximately October 8, 2020, Mark Cassanova spoke to the potential Jewish tenants for the upstairs apartment. He called me a "liar and mentally ill" and that they should not rent the upstairs apartment. The broker is the witness to all this.

129. For the past 10 years, I did not know the name of the next door neighbor and did not speak to them. The only way I know their last names is because their names are on the mailbox. Since my sister came to New York in July 2019, the Cassanovas mentioned my sister's name. How did they know my sister's name when she has not been here for the past 39 years?
130. The Cassanovas began to curse me and call me an "ugly f---k bitch" and "crazy bitch," when I had nothing to do with them and never provoked them.
131. Due to death threats, harassments, and disappearance of my checkbooks I had to install security cameras.
132. On October 14, 2020, Judge Ottley herself called me at 4:15 pm, while I am at work, on an order to show cause made by defendant NYGS and their attorney defendant Mordechai Buls having to do with my father's safe deposit boxes.
133. Defendant Ken Barocas, defendant NYLS, and their attorney defendant Mordechai Buls have poisoned Judge Ottley against me by claiming that I stole my father's "millions" from his safe deposit box when there is no documentation proving that my father had millions of dollars in diamonds. Wouldn't there be an insurance policy if there was millions of dollars in diamonds?
134. On October 14, 2020, defendant Ken Barocas has made a claim that I forged my mother's signature on the power of attorney, however Judge Ottley in her decision dated December 16, 2020 has not acknowledged any signature of power of attorney.
135. On October 14, 2020, Judge Ottley called this a "cat and mouse" and a "serious situation" when there is a will giving me the contents of the safe deposit boxes.
136. The crooked defendants Buls, Daniel Miller, Ken Barocas, and defendant Peter Strauss claimed that my mother was incompetent. However, Kings County Hospital released her three times within 24 hours from the psychiatric ward on the grounds that she is not a risk to herself and others and is competent.
137. The crooked defendant Russell Morgan, my ex-attorney, refused to do a mental health warrant to put a hold on her at the psychiatric hospital. However, the defendants made an order to show cause dated October 14,

2020, claiming that my mother was incompetent when she went to her safe deposit boxes in January 2020.

138. I sent dozens of emails to Judge Ottley informing her that defendant NYGS (temporary guardian) is not doing his job. I told her that he is not paying any bills and is allowing the upstairs tenants to damage the property. Whatever I emailed her was ignored. I also carbon copied the emails to Judge Knipel.

139. I informed the two judges that defendant NYGS was harassing me by telling the police that I am an emotionally disturbed person on June 25, August 12 and August 13, 2020. Upon information and belief, defendant NYGS have done this to other clients.

140. Judge Ottley is allowing defendant NYGS and defendant Mordechai Buls to get control of the overseas properties even though my father willed me all these properties. Upon information and belief, the above defendants have done this to others.

JUDGE OTTLEY IS A BIASED JUDGE THAT ALLOWED THE CROOKED 80 YEAR OLD DEFENDANT STRAUSS TO RUN HER COURTROOM. SHE HAS NO COMMON SENSE AND IS NOT FIT TO BE A JUDGE. SHE MAY BE ON HER WAY OUT AS A JUDGE AND TOOK OUT ALL HER FRUSTRATIONS ON ME. SHE HAS INSINUTATED THAT I AM "CRAZY" FOR EMAILING HER PICTURES OF THE DAMAGE THAT THE UPSTAIRS TENANTS HAVE DONE AND THAT THE GUARDIAN IS NOT DOING HIS JOB.

141. Judge Ottley is a biased judge that refused to listen that the guardian is not doing his job and allowed the former upstairs tenant to damage the property. She insinuated that I am crazy for emailing that the temporary guardian is not doing his job.

142. On June 29, 2020, the plumber and other professionals attempted to testify that the upstairs tenants are intentionally ruining the property, however, the judge refused to hear it. Upon information and belief, defendant NYGS have done this to others.

143. On June 29, 2020, when I attempted to explain to judge Ottley that defendant Morgan, my ex-attorney did not represent me and did not file any opposition papers every other word was "stricken from the record".

144. On September 9, 2020 during the hearing, Judge Ottley was friendly, smiling and joking around with David Blau, executive director of the New York Guardianship. However she screamed at me non-stop for three hours straight.

THE BIASED JUDGE OTTLEY IS USING HER POWER TO INTIMIDATE OTHERS AND TAKE OUT HER FRUSTRATIONS ON OTHERS. SHE HAS STATED TO ME "TAKE THAT SMILE OFF YOUR FACE" AND REPEATEDLY STATED "STRICKEN FROM THE RECORD" WHEN I STATED THAT THE DEFENDANT MORGAN DID NOT DO HIS JOB AND NEVER FILED OPPOSITION PAPERS.

145. On September 9, 2020 during the hearing, Judge Ottley accused me of having my phone on and screamed at me for three hours straight. My friend David Roemer tried to reach me for hours and then came over and knocked on the door. When I did not answer, he called the cops.

146. On September 9, 2020, the crooked defendant Goldie Shabtai gave a wrong address of one of my father's properties claiming that it belongs to her. She used the address Harav Levine 5, which was her own former address when she was married to her ex-husband.

SOMETHING VERY NON-KOSHER IS HAPPENING HERE.

ON SEPTEMBER 9, 2020, THE BIASED JUDGE OTTLEY SCREAMED NON-STOP FOR HAVING MY PHONE ON WHEN IT WAS CLOSED. ANYONE THAT USES THE ZOOM MEETING KNOWS THAT THERE IS A FEATURE TO MUTE THE PARTICIPANTS. SHE USED HER POWER TO SCREAM AT ME NON-STOP FOR NO REASON WHEN SHE COULD HAVE USED THE MUTE BUTTON TO SHUT THE PARTICIPANT WITH THE PHONE ON. THIS WAS DONE INTENTIONALLY.

147. On September 9, 2020, the judge screamed non-stop at me for three hours straight on the zoom meeting for having the phone on when I never had the phone on. There is a feature on the zoom meeting to mute an individual which the judge knows about; however used her power to intimidate me for no reason and scream non-stop about a phone that is on when I never had it on.

148. The above defendants are using a biased judge to force an unneeded guardian on a property that was willed to me by my father.

149. On October 6, 2020, Judge Ottley signed an order to show cause to vacate the temporary guardian; however on October 27, 2020 on the day of the hearing a wrong link was sent to me.

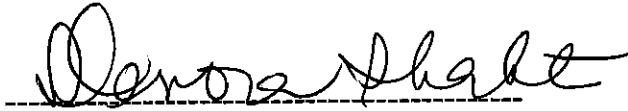
I INCLUDED SEVERAL TIMES THE POWER OF ATTORNEY THAT I HAVE ON BEHALF OF MY MOTHER AND WILL THAT STATED THAT THE PROPERTIES BELONGS TO ME INCLUDING THE BROOKLYN PROPERTY. HOWEVER THE BIASED JUDGE OTTLEY IGNORED IT ALL.

150. The crooked defendants and the biased judge Ottley received a copy of the will that stated that the properties belongs to me and I have power of attorney that was included several times in the order to show cause that she kept on denying.
151. On October 14, 2020 at 415 pm in the afternoon, Judge Ottley herself called me on my cell about an order to show cause that defendant Buls and defendant NYLS, the guardian filed concerning my father's safe deposit boxes.
152. On October 14, 2020, defendant Ken Barocas accused me of forging my mother's signature on the power of attorney on behalf of my mother, however in Judge's Ottley's decision dated December 16, 2020 she stated that I did not produce a power of attorney to the court.
153. On October 14, 2020, the crooked defendant Ken Barocas claimed that I stole "millions" from my father safe deposit boxes. The "millions" defendant Ken Barocas refers to are the diamonds my sister may have stole from my father when he was in Israel and mentioned in the will.
- WITHOUT EVIDENCE THE BIASED JUDGE OTTLEY STATED ON RECORD TO HAVE ME BROUGHT TO THE DISTRICT ATTORNEY'S OFFICE FOR FORGERY**
154. On October 14, 2020, the biased Judge Ottley tried to intimidate me by stating to the defendants to take me to the "district attorney's office" for the alleged "forgery" on the power of attorney.
155. On October 27, 2020, I immediately contacted the court that I did not receive the link to contact the court and they told me that the hearing was already held.
156. On November 3, 2020; I sent Judge Ottley a new order to show cause and she denied it. Based on this information she has never intended to vacate the temporary guardian and intended all along to place a guardian on my property.
- THE JUDGE BENT BACKWARD TO APPEASE THE ABOVE DEFENDANTS AND MY SISTER DEFENDANT GOLDIE SHABTAI**
HOW CAN A JUDGE PLACE A GUARDIAN ON A PROPERTY THAT WAS WILLED TO ME BY MY FATHER AND WHERE I HAVE BEEN LIVING FOR MOST OF MY LIFE?
157. The biased Judge Ottley claimed that she will wait after the pandemic to check whether the property taxes are being paid, however on December 16, 2020 made an order giving the crooked defendant NYGS the guardianship of my property.

158. Upon information and belief, Judge Lisa Ottley is not fit to be a judge and the all the above defendants should be disbarred and have an official reprimand on their law license. And surely defendant NYGS is not fit to be the guardian.
159. The above defendants are violating my civil rights. Even if assuming that I am mentally ill, I am functioning and taking care of the property and there is no reason why that position should be taken away from me.
160. Defendant NYGS took it a step further and tried to have me committed to a mental hospital when I never provoked anyone or did anything to anyone.
161. The above defendants are committing FRAUD knowing very well that I am the daughter of the alleged incapacitated person and I am entitled to be her guardian. Why shouldn't I be her guardian when I lived with her all my life?
162. The above defendant Morgan committed malpractice of not doing anything. He defrauded me and misinformed me to go into guardianship court when it was not necessary to go into guardianship court when I have a power of attorney, I am taking care of the property and my mother is in a rehab center.
163. Defendant Morgan and the above defendants are enriching themselves nefariously and unjustly when no guardian was necessary.
164. The crooked defendant NYGS with their crooked lawyer defendant Buls want to extend their jurisdiction to Israel to raid my monies and properties that belong to me and my mother.
165. Defendant Buls, defendant NYGS, defendant Strauss, defendant Barocas, defendant Miller and defendant Goldie Shabtai know there is a will giving me all the properties and want to raid my properties and my monies with unnecessary litigation for their own benefits and wallets.
166. What is the monetary benefit to defendant Goldie Shabtai of having a guardian on the properties? Her crooked attorney, defendant Strauss only interest is to earn \$600 an hour on an unnecessary litigation.
167. This is pure harassment intending to break me down emotionally and psychologically that I would not be able to function in my job and life and thereby lose everything.
168. Upon information and belief, this is a kabal of crooked defendant lawyers that intended from day one to raid my properties and monies.

169. Therefore, I request a relief of a million dollars from each defendant and a million dollars for intentional infliction of emotional distress.

Dated: Brooklyn, New York
December 22, 2020

A handwritten signature in cursive script, appearing to read "Devora Shabtai", written over a horizontal dashed line.

Devora Shabtai

Pro Se
Reviewed

KH



Ruby J. Krajick
Clerk of Court

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK
Daniel Patrick Moynihan United States Courthouse
500 Pearl Street, New York, N.Y. 10007

MEMORANDUM OF PRO SE FEE

CASE CAPTION:

Devora Shabtai

Godie Shabtai, New York Guardianship
services, Mordcha, Buls, Peter Strauss, Ken Barocas
Daniel Miller, Russell Morgan

Select Venue: Manhattan: ☒

White Plains: _____

Has this action, case, or proceeding or one of the same been previously filed in S.D.N.Y. at any time? ☒ No _____ Yes
If yes, please provide the docket number here _____ Was this case dismissed? _____ No _____ Yes

Natures of Suit:

- ____ 440 Other Civil Rights
____ 442 Employment
____ 462 Naturalization Application
____ 463 Alien Detainee
____ 465 Other Immigration Actions
____ 510 Motions to Vacate Sentence 28 USC 2255
____ 530 Habeas Corpus
____ 540 Mandamus & Other
☒ 550 Civil Rights
____ 555 Prison condition
____ 820 Copyrights
____ 830 Patents
____ 840 Trademark
____ 863 DIWC/DIWW (405(g))
____ 864 SSID Title XVI
____ 890 Other Statutory Actions
____ Other Nature of Suit: _____

Do you claim this case is related to a civil case now pending in S.D.N.Y. as defined by Local Rule for Division of Business 13? If
yes, please provide the docket number here _____

FILING FEE:

☒ \$402.00 NEW COMPLAINT _____ \$5.00 HABEAS CORPUS PETITION _____ IFP

CASE #

20 CV 10868

JUDGE ASSIGNED

JUDGE KOELTL

RECEIPT #

465401271070**MAG. JUDGE PARKER**

**AFTER YOUR PAYMENT HAS BEEN PROCESSED, PLEASE RETURN THIS FORM WITH A COPY OF
THE RECEIPT TO THE PRO SE INTAKE UNIT TO COMPLETE THE FILING PROCESS.**